

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:19-CV-767-ECM
)	
HYUNDAI MOTOR)	
MANUFACTURING, ALABAMA,)	
LLC; HYUNDAI ENG AMERICA,)	
INC.; and DYNAMIC SECURITY,)	
INC.)	
)	
Defendants.)	

**PLAINTIFF’S RESPONSES TO
DEFENDANT DYNAMIC SECURITY, INC.’S OBJECTIONS TO
PLAINTIFF’S WITNESS LIST**

COMES NOW the Plaintiff, pursuant to this Court’s amended scheduling Order (Doc. 57) and files these responses to Defendant Dynamic Security, Inc.’s (“Dynamic”) objections (Doc. 134) to Plaintiff’s Witness List (Doc. 101) to permit the Court to rule on the objections before trial:

Defendant, Dynamic Security only objects to one witness on Plaintiff’s Witness List, Chris Hargove. Defendant objects that the witness was not included in initial

Plaintiff’s Response to Dynamic Security Objections to Plaintiff’s Witness List
Key v. Hyundai Motor Manufacturing, et al
United States District Court for the Middle District of Alabama
Civil Action 2:19-CV-767-ECM

disclosures. However, the Defendant was discovered through documents produced by Defendant Dynamic in discovery so Defendants are not prejudiced.

Additionally, Plaintiff only designated Chris Hargove as a witness out of an abundance of caution, in the event Defendant Dynamic raises some issue making Hargrove necessary for rebuttal. Plaintiff does not intend to call Hargrove in her case in chief unless Defendant presents something in opening that necessitates his use.

Respectfully submitted,

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ASB-1152-061H

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ASB-0436-L40P

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Certificate of Service

I hereby certify that I have filed the foregoing on the Court's CM/ECF electronic filing system which will provide notice to all counsel of record on this 16th Day of February, 2023.

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